

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLEBRYCE KISKER and JENNIFER KISKER,  
husband and wife,

Plaintiffs,

v.

SAFECO INSURANCE COMPANY OF  
AMERICA, a foreign company,

Defendant.

Case No. 2:24-cv-01251-BJR

STIPULATED MOTION AND ORDER FOR  
EXTENSION OF EXPERT DISCLOSURE  
AND REPORT DEADLINESNoted for Consideration:  
June 6, 2025**JOINT STIPULATION**

The parties certify they have met and conferred per the Honorable Judge Barbara J. Rothstein's standing order and hereby jointly STIPULATE AND AGREE to request an extension of their expert disclosures and discovery deadlines, which were set forth in the Court's October 4, 2024, Order Setting Trial Date and Related Dates (Dkt. 12), as set forth below.

<b><u>Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
JURY TRIAL	January 5, 2026	No change
Reports from expert witnesses under FRCP 26(a)(2) due	June 9, 2025	August 25, 2025
Discovery completed by	July 9, 2025	September 26, 2025

STIPULATED MOTION AND ORDER  
FOR EXTENSION OF EXPERT DISCLOSURE  
AND REPORT DEADLINES  
2:24-cv-01251-BJR***Poli, Moon & Zane, PLLC***  
600 1<sup>st</sup> Ave., Suite 102 #2093  
Seattle, Washington 98104  
206-704-5653

1 A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Extension of deadlines  
 2 are only granted by this court where good cause is evident. The parties submit that good cause exists  
 3 for extending these specific deadlines. The dispositive motions filing deadline of August 8, 2025,  
 4 remains unchanged.

5 Specifically, an appraisal was conducted in this matter, resulting in an appraisal award  
 6 dated March 25, 2025. To preserve party resources, the parties deferred retaining experts in this  
 7 matter. At the same time, the parties have been diligent in pursuing other discovery to be done in  
 8 this case, including exchanging over 6,000 pages of discovery, completing initial written  
 9 discovery, and scheduling witness depositions.

10 The collection of relevant documentation is still on-going, and critical. The parties expect  
 11 to collect thousands more pages of pictures and records that will need to be reviewed, organized,  
 12 and then sent to experts for review. Expert reports would be prepared based on this fuller record.

13 For the reasons set forth above, the parties believe that there exists good cause to request  
 14 an extension of the above-listed dates and respectfully request that the Court grant their motion.

15 SO STIPULATED.

16 DATED this 3rd day of June 2025.

17 Respectfully submitted,

18 s/Jeffrey G. Zane

*Attorneys for Plaintiffs*

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 20 Mike N. Poli WSBA# 63619  
 21 600 1<sup>st</sup> Ave., Suite 102 #2093  
 22 Seattle, Washington 98104  
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1 s/Michael D. Handler

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**ORDER**

It is hereby ORDERED that the parties' motion is GRANTED. The new disclosure and expert deadlines are as follows:

<b><u>Deadlines</u></b>	
TRIAL	Unchanged January 05, 2026
Reports from expert witness under FRCP 26(a)(2) due	August 25, 2025
Discovery completed by	September 26, 2025

DATED this 5th day of June 2025.



HONORABLE BARBARA J. ROTHSTEIN  
United States District Judge